

Robocall Mitigation Plan for Syntracom LLC
Updated as of February 26, 2026

Introduction Syntracom LLC ("SL"), a small provider of customized telephony and data services, serves small and medium businesses (including hospitality, retail, and commercial sectors) with tailored phone solutions such as for hotels and call centers. SL does not provide wholesale services, SIP trunking, origination for resellers, or act as an intermediate/gateway provider in any call path. SL does not accept foreign-originated traffic and operates solely with domestic U.S. NANP resources for retail end-user customers.

As a small provider without its own Class 4 switch or least-cost routing platform, SL relies on trusted underlying carriers for DID origination, call termination, and STIR/SHAKEN attestation/signing.

This Robocall Mitigation Plan outlines SL's measures to detect, prevent, and mitigate unlawful robocalls in compliance with FCC regulations, including section 64.6305 and the updated requirements from the 2025 Robocall Mitigation Database Report and Order (effective February 5, 2026, with first annual recertification due March 1, 2026). SL's retail-focused model and end-user business customers result in inherently low robocall risk, as traffic involves standard, legitimate business communications rather than high-volume outbound campaigns.

1. Contact Information Syntracom LLC

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Email Address: support@syntracom.net

Phone: 316-633-4000

Principals, Affiliates, Subsidiaries, and Parent Companies:

- Barry Beshirs

SL affirms that neither it nor any affiliated entity has been subject to FCC or law enforcement action related to illegal robocalling, spoofing, or RMD deficiencies in the past two years.

2. Implementation of STIR/SHAKEN Framework SL complies with FCC STIR/SHAKEN caller authentication requirements through its underlying carrier partnerships. As a small retail provider without direct control over origination signing infrastructure:

- All outbound calls from SL's network are authenticated and signed by the underlying carrier using appropriate attestation levels (typically A for verified customer DIDs).

- SL's customers benefit from enhanced call trust and integrity via this upstream implementation.
 - SL certifies partial STIR/SHAKEN implementation (Option 2 in RMD) for IP portions of the network, relying on upstream providers for technical attestation/signing. SL makes all attestation-level decisions based on verified customer right-to-use of DIDs and provides this information to the upstream carrier for signing. SL does not maintain its own SPC token or certificate, as this is unnecessary and disproportionate for a small retail provider without wholesale, high-volume origination, or facilities-based IP origination infrastructure.
 - SL confirms no previous certification has been removed by Commission action.
3. **Robocall Monitoring and Mitigation** SL prevents illegal robocalls through basic monitoring and customer controls appropriate to its small retail model:

Traffic Monitoring

- Relies on underlying carriers' real-time analytics to flag anomalies (e.g., high volumes, short durations, suspicious patterns, ASR/ACD deviations, call velocity, snowshoeing). SL receives and reviews all high-risk alerts within 4 hours and takes immediate action. Independent advanced analytics are unnecessary, as retail end-user traffic is low-volume and predictable (standard business calls).

Customer Vetting

- Verifies new retail business customers' identity and intended legitimate use (e.g., hospitality/retail communications).
- Requires agreement to terms prohibiting illegal robocalling/TCPA violations.
- Requires all customers to agree to prohibitions on robocalling and immediately blocks any numbers identified on the FCC Do-Not-Originate (DNO) list via upstream enforcement.
- Takes reasonable steps to prevent origination of illegal calls, though retail business customers pose minimal risk compared to wholesale scenarios.

Complaint Resolution

- Provides a process for reporting suspected robocalls (via support channels or email: support@syntracom.net).
- Investigates and takes corrective action, up to service termination if violations confirmed.

4. **Call Analytics and Upstream Provider Procedures**

- **Call Analytics:** SL utilizes underlying carriers' real-time call analytics platforms, which monitor ASR, ACD, call velocity, short-duration patterns, and snowshoeing. SL receives and reviews all high-risk alerts within 4 hours and takes immediate action. As a small provider without its own switching platform, independent analytics are unnecessary and disproportionate to risk.
- **Upstream Provider Procedures:** Prior to contracting and annually thereafter, SL verifies each upstream provider's active RMD filing, STIR/SHAKEN status, and robocall mitigation plan via the RMD portal before routing any traffic. Periodic reviews confirm ongoing compliance.

5. **Compliance with FCC Requirements** SL fully complies with FCC robocall mitigation rules:

- Maintains an active filing in the FCC's Robocall Mitigation Database (RMD), including role (voice service provider serving end-users), STIR/SHAKEN status, and mitigation plan.
- **Annual Recertification:** Will recertify RMD filing annually by March 1 (first deadline March 1, 2026; window opens February 1, 2026). Recertification involves logging into the RMD portal with multi-factor authentication (required effective February 5, 2026), verifying accuracy of all information (mitigation practices, STIR/SHAKEN certification, contacts), updating if needed, and submitting via the "Recertify" button.
- **Prompt Updates:** Updates RMD and CORES registration within 10 business days of any material change (e.g., ownership, contacts), per 47 CFR § 64.6305.
- Responds fully to ITG traceback requests within 24 hours.
- Pays any required filing fees to the FCC
- Responds promptly to FCC deficiency notices, curing issues within specified timeframes to avoid RMD removal or traffic blocking. Noncompliance risks include base forfeitures (\$10,000 for false/inaccurate info; \$1,000 per day until cured for late updates). SL does not possess an Operating Company Number (OCN), as it is a small retail provider without local exchange carrier status. Per FCC guidance, no OCN is required, and "No" is selected on the RMD form.

6. **Future Enhancements** SL commits to ongoing improvement:

- Monitoring upstream carrier enhancements for better analytics/blocking.

- Educating customers on robocall awareness/reporting.
 - Adapting to emerging threats (e.g., AI voice cloning) via upstream partnerships and FCC guidance.
7. **Commitment to Correct Deficiencies** SL will address any FCC-notified RMD deficiencies immediately, updating certifications/plans, explaining actions, and ensuring compliance to maintain filing status.

Conclusion

Syntracom LLC is dedicated to protecting its small and medium business customers and the public from illegal robocalls. Through reliable upstream partnerships, customer-focused controls, and full adherence to updated FCC requirements (including 2026 annual recertification by March 1), SL provides secure, compliant telephony and data services. As a small retail provider with no wholesale or international elements, SL's plan is proportionate, effective, and aligned with FCC expectations for low-risk entities.

Authorized By: Syntracom LLC Compliance Team

Contact: Barry Beshirs, Regulatory Contact

Program Review Cycle: Annual or as required by FCC changes